

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 56

That on or about 10th day of December, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 57

That on or about 10th day of January, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 58

That on or about 7th day of February, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 59

That on or about 15th day of March, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 60

That on or about 16th day of April, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 61

That on or about the 6th of day of May, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 62

That on or about the 1st day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 63

That on or about the 5th day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 64

That on or about the 8th day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 65

That on or about the 27th day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 66

That on or about the 10th day of July, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 67

That on or about the 20th day of August, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 68

That on or about the 28th day of September, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2

COUNT 69

That on or about the 17th day of October, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 70

That on or about the 16th day of January, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 71

That on or about the 6th day of February, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 72

That on or about the 12th day of March, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 73

That on or about the 2nd day of May, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 74

That on or about the 30th day of May, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 75

That on or about the 2nd day of March, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 76

That on or about the 19th day of March, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 77

That on or about the 22nd day of March, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 78

That on or about the 21st day of July, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 79

That on or about the 24th day of November, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 80

That on or about the 8th day of February, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 81

That on or about the 18th day of April, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 82

That on or about the 19th day of May, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 83

That on or about the 2nd day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 84

That on or about the 29th day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 85

That on or about the 28th day of August, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 86

That on or about the 25th day of May, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 87

That on or about the 28th day of May, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 88

That on or about the 3rd day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 89

That on or about the 14th day of July, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 90

That on or about the 15th day of July, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 91

That on or about the 16th day of July, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 92

That on or about the 17th day of July, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 93

That on or about the 10th day of October, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 94

That on or about the 14th day of April, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 95

That on or about the 19th day of April, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,

manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 96

That on or about the 6th day of May, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 97

That on or about the 14th day of May, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 98

That on or about the 3rd day of June, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 99

That on or about the 19th day of February, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNTS 100 AND 101

That on or about the dates set forth below, in the District of Alaska, and elsewhere, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did knowingly conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is, the use of an interstate facility in aid of racketeering enterprise, in violation of Title 18, Section 1952(a)(3), United States Code, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source,

ownership, and control of the said proceeds, by making and passing checks to an individual as a loan, in the amounts set forth below, the defendant then and there further knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
100	March 16, 2000	\$5000.00
101	March 20, 2000	\$20,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i).

COUNTS 102 THROUGH 104

That on or about the dates set forth below, in the District of Alaska, and elsewhere, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did knowingly conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is, the distribution of controlled substances, in violation of Title 21, Section 841, United States Code, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the said proceeds, by making cash payments to an individual partly as a loan and partly to purchase real property, in the amounts set forth below, the defendant then and there further knowing that the property involved in the financial transactions represented the proceeds of some

form of unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
102	March 20, 2000	\$5000.00
103	May 22, 2000	\$15,000.00
104	June 14,2000	\$15,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i).

COUNTS 105 THROUGH 119

That on or about the dates set forth below, in the District of Alaska, and elsewhere, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did knowingly conduct financial transactions which involved the proceeds of specified unlawful activity, that is, the use of an interstate facility in aid of racketeering enterprise, in violation of Title 18, Section 1952(a)(3), United States Code, with the intent to promote the carrying on of said specified unlawful activity and knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the said proceeds, by making payments on a loan on real property in the amounts set forth below, the defendant then and there further knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>AMOUNT</u>
105	April 14, 1998	\$5,000.00

106	May 6, 1998	\$3,500.00
107	July 2, 1998	\$1,750.00
108	August 1, 1998	\$18,000.00
109	August 6, 1998	\$1,750.00
110	September 8, 1998	\$3,500.00
111	November 2, 1998	\$3,500.00
112	March 2, 1999	\$3,500.00
113	April 24, 1999	\$3,500.00
114	June 7, 1999	\$3,500.00
115	August 4, 1999	\$3,500.00
116	September 20, 1999	\$7,000.00
117	December 17, 1999	\$7,000.00
118	April 18, 2000	\$7,000.00
119	November 27, 2000	\$17,000.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i).

COUNT 120

That on or about 17th day of April, 2001, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank \$3,500 representing the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 121

That on or about 23rd day of May, 2001, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank \$4,700 representing the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 122

That on or about 15th day of June, 2001, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank \$2,500 representing the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 123

That on or about the 14th day of September, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, and Ramiz M. Bordonici did unlawfully and knowingly engage in a monetary transaction in criminally derived property of a value greater than \$10,000, affecting interstate commerce, that is, the purchase of a 2000 GMC Yukon XL automobile with United States funds in the approximate amount of \$25,000, such funds having been derived from specified unlawful activity, to wit, the use of a facility in interstate commerce in aid of racketeering

enterprises, in violation of Title 18, United States Code, § 1952, all in violation of Title 18, United States Code, § 1957.

COUNT 124

That on or about the 26th day of June, 2001, at or near Anchorage, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, having taken an oath before a competent tribunal, the United States District Court for the District of Alaska, in a case in which a law of the United States authorizes an oath to be administered, that he would testify truly, did willfully and contrary to such oath state material matters which he did not believe to be true, by stating under oath in support of his request for a court-appointed attorney that he had no bank accounts, possessed only \$4000, was not owed money by anyone, and that besides a car and some property that he would succeed to if his brother died, he had no other property, when, as the defendant well knew, said statements were materially false, all in violation of Title 18, United States Code, Section 1621(1).

FORFEITURES

Pursuant to Title 18, United States Code, Sections 982(a)(1) and 981(a)(1)(C), Title 28, United States Code, Section 2461, and Title 21, United States Code, Sections 853 and 881(a)(7), each defendant who is convicted of one or more of the offenses set forth in this Indictment shall forfeit to the United States the following property:

- a. All right, title and interest in any and all property involved in each offense

in violation of Title 18, United States Code, Section 1956 or Section 1957 or Section 1952, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property, including the following:

- 1) all money or other property that was the subject of each transaction in violation of Section 1956 (a)(1) or (a)(3), or Section 1957, or Section 1952, specifically –

511 Gaffney Road, Fairbanks, Alaska, also described as Lot 7, Block 1, Gateway Subdivision, Fairbanks, Parcel Account # 0064823;

Tract C5, Jolley Acres, Replat 85-218 9/16/85, also described as 2891 Glacier State Drive, North Pole, Alaska, Parcel Account # 0302571;

Promissory Note for \$30,000.00, dated March 20, 2000, at Fairbanks, Alaska, payable to defendant “Bruno Bordonici;”

\$17,000 in cash withdrawn from the Key Bank account of International Check Cashing on or about September 26, 2000;

- 2) all charges, fees and other property constituting proceeds obtained as a result of those violations; and
- 3) all property used in any manner or part to commit or to facilitate the commission of those violations.

b. All right, title and interest in any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of violation of

Title 21, United States Code, Section 841, for which the defendant is convicted, and all property used or intended to be used in any manner or part to commit or to facilitate the commission of such violation, including the following:

3864 Peger Road, Fairbanks, Alaska, also described as Tax Lot 2027
in Section 20, T1S, R1W, Fairbanks Meridian, Parcel Account #0170020;

511 Gaffney Road, Fairbanks, Alaska, also described as Lot 7, Block
1, Gateway Subdivision, Fairbanks, Parcel Account # 0064823;

Tract C5, Jolley Acres, Replat 85-218 9/16/85, also described as
2891 Glacier State Drive, North Pole, Alaska, Parcel Account # 0302571;

Promissory Note for \$30,000.00, dated March 20, 2000, at
Fairbanks, Alaska, payable to defendant "Bruno Bordonici;"

\$17,000 in cash withdrawn from the Key Bank account of
International Check Cashing on or about September 26, 2000;

c. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted.

d. Pursuant to Title 21, United States Code, Section 853 (p), and as that section is incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraphs a, b, and c, if by any act or omission of the defendant, the property described in any part of said paragraphs cannot be located upon the exercise of due diligence; has been transferred, sold

to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL.


GRAND JURY FOREPERSON


TIMOTHY M. BURGESS
United States Attorney


STEPHEN COOPER
Assistant United States Attorney

DATED: SEPTEMBER 19, 2001